

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 1:20-00962
MICHAEL D. NOLAN	: Chapter 13
LINDA R. NOLAN	:
Debtor	:
	:
US BANK TRUST NATIONAL ASSOCIATION,	:
NOT IN ITS INDIVIDUAL CAPACITY, BUT	:
SOLELY AS TRUSTEE OF CITIGROUP	:
MORTGAGE LOAN TRUST 2018-C	:
Movant	:
vs.	:
	:
MICHAEL D. NOLAN	:
LINDA R. NOLAN	:
Debtor/Respondent	:

**ANSWER TO MOTION FOR RELIEF FROM STAY**

AND NOW, comes the Debtors, Michael D. and Linda R. Nolan, by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief from Stay filed by CITIGROUP MORTGAGE as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtors entered into bankruptcy on March 12, 2020 requiring their first post-petition payment to be in April. Debtor's have made both April and May payments and are now due for June.
7. Denied. Debtors are in arrears one month for \$1,130.50.

8. Denied. This is a conclusion of law to which no responsive pleading is necessary.
9. Denied. Debtor feels this amount is excessive.
10. Admitted.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,  
/s/ James H. Turner  
James H. Turner  
Turner and O'Connell  
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**CERTIFICATE OF SERVICE**

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Charles J. DeHart III, Esquire  
8125 Adams Drive  
Suite A  
Hummelstown, PA 17036

James C. Warmbrodt, Esquire  
KML Law Group P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106

Date: 7/6/20

/s/ James H. Turner  
James H. Turner